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9 Attorneys for Bankruptcy Claimants,  
10 STEPHEN PUTNAM HERRIN, individually  
11 and as Trustee of the DONALD E. RYCKMAN  
12 and ROSEMARY H. RYCKMAN  
13 REVOCABLE  
14 TRUST DATED FEBRUARY 25, 1999

15 Matthew W. Grimshaw, Esq. (SBN 210424)  
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21 Counsel for Robins Cloud LLP

22 UNITED STATES BANKRUPTCY COURT  
23  
24 NORTHERN DISTRICT OF CALIFORNIA  
25  
26 SAN FRANCISCO DIVISION

27 In re  
28 PG&E CORPORATION and PACIFIC GAS  
AND ELECTRIC COMPANY

Debtors

Case No. 19-30088 (DM)

Chapter 11

DECLARATION OF REX GRADY, ESQ.  
IN SUPPORT OF MOTION FOR ORDER  
AUTHORIZING WITHDRAWAL OF  
COUNSEL

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1 **Declaration of Rex Grady**

2 I, Rex Grady, say and declare as follows:

3 1. I am an individual over 18 years of age and competent to make this Declaration.

4 2. I am an attorney at law duly admitted to practice before all courts of the State of  
5 California, in addition to the United States District Court for the Northern District of California.

6 3. I am an attorney employed by the law firm of Robins Cloud LP (the "Firm"),  
7 attorneys of record for Bankruptcy Claimant, Stephen Putnam Herrin, individually and in his  
8 capacity as Trustee of the Donald E. Ryckman and Rosemary H. Ryckman Revocable Trust Dated  
9 February 25, 1999 ("Trust").<sup>1</sup>

10 4. The facts set forth below are true and within the scope of my personal knowledge,  
11 and if called upon to do so I could and would testify competently to these facts.

12 5. On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company  
13 ("Debtors") filed voluntary petitions for bankruptcy under Chapter 11 of Title 11 of the United  
14 States Code, initiating bankruptcy case number 19-30088 in the Bankruptcy Court for the Northern  
15 District of California, San Francisco Division ("Bankruptcy Case").

16 6. On December 26, 2019, Mr. Herrin signed a retainer agreement ("Agreement")  
17 with the Firm, engaging the Firm for legal representation in connection with the Bankruptcy Case,  
18 both on his behalf individually and as Trustee of the Trust. On that same day, the Firm filed Claim  
19 No. 91428 on behalf of Mr. Herrin individually, and Claim No. 91749 on behalf of the Trust.

20 7. In the first half of May of 2020, Withdrawal of Claim forms signed by Mr. Herrin  
21 were filed in the Bankruptcy Court's San Francisco Division through the Prime Clerk web portal  
22 withdrawing the aforementioned claims. The two Withdrawal of Claim forms have file dates of  
23 May 8, 2020 (as to Claim No. 91749) and May 11, 2020 (as to Claim No. 91428). The Firm was  
24 not aware beforehand of the withdrawal of the claims.

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27 <sup>1</sup> Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other  
28 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client  
relationship with Mr. Herrin or the Trust.

1           8.       To the extent that Mr. Herrin requests that the Firm turn over any files or  
2 information that he is entitled to, the Firm will cooperate and transmit such files.

3           I declare under penalty of perjury that the foregoing is true and correct. Executed on  
4 June 26, 2020.

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8 Rex Grady  
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